

COMPLAINT 23 CV 258 JDP

FILED/REC'D

2023 APR 26 A 10:03

I am filing this complaint in western district of Wisconsin violation of my first amendment and 4th amendment in 2019 by detective Kneubuhler of Madison police agency concurrently against officer Muir of m.p.d.

The jurisdiction is South District (park street) Madison . The violation stems from an alleged road rage incident where we will use initials A.K as detective Adam Kneubuhler and O.M as officer Muir. I was essentially confronted by A.K. days after I had flipped him off in traffic , which he retaliated by falsely accusing me and arresting me on park street behind the Jade Garden Chinese restaurant. I also contend this was also raping /violation of my 4 th amendment as This was an **un-lawfull detainment**. I was then transported to Dane county jail and illegally detained for over 2 hours while O.M grilled me questions . I must emphasize the 'swat team' style confrontation behind Jade Garden was not only witnessed by the Chinese owners and the family, but also affidavits signed by them as to what they witnessed, the man-handling and injury sustained . The body worn cameras also have been added to this case file as exhibit #4. By swat team I mean over five officers responded to this call. Exhibit #1 is the probable cause document drafted by A.K. in his efforts to retaliate.

Exhibit #2 is the weak and might I add defective criminal complaint fabricated by bot A.K and O.M

Exhibit #3 is the ACTUAL interaction of the allegation which was later sent to district attorneys office to which the infallible evidence led to a dismissal of the charges . D.a. Awais Khaleel and Judge Nicholas McNamara upheld justice in this ' criminal case ' dismissing this case.

Exhibit #3 is also on social media like youtube and facebook reels, interesting to note the interaction was less then 2 minutes in duration yet A.K had fabricated over two pages of filth and LIES about it.

I am requesting a 'trial by judge ' or a 'bench trial' [**BENCH TRIAL DEMAND**] to save taxpayers money and resources as opposed to a 'jury trial ' . I believe my evidence is strong enough for a judge to make a ruling .

I am requesting my medical bills be paid by M.P.D for the P.T.S.D suffered from this episode, along with emotional duress, pain and suffering , and over-all punitive damages.

Lastly I request the fees for 'filing ' this complaint and lawsuit be waived do to indigency .

Please send the indigency form and all future correspondence to:

Randin Divelbiss

1302 Huxley St, WI, 53704

April 4 2023

R-T Divelbiss